



**Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket 06-36**

**Annual 64.2009(e) CPNI Certification for Year 2012 Covering the  
Calendar Year Ended December 31, 2011**

Date Filed: February 10, 2012

Name of company covered by this certification: Advanced Corporate Networking, Inc.

Form 499 Filer ID: 824216

Name of signatory: Ronald Richtarich

Title of signatory: Managing Partner/Secretary

I, Ronald Richtarich, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.20001 et seq. of the Commission's rules.

The company has not taken actions against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Advanced Corporate Networking, Inc.

By Ronald Richtarich  
Its Managing Partner/Secretary

STATE OF CONNECTICUT )  
COUNTY OF New Haven CT )

ss:

February 6, 2012

Personally appeared, Ronald Richtarich, who swore to and subscribed the above certification  
before me, this 6 day of February, 2012.

Ronald F. Black  
Notary Public/  
Commissioner of the Superior Court 4/2016

**Advanced Corporate Networking, Inc.**  
**Accompanying Statement to Annual Certification of CPNI**  
**February 10, 2012**

I am the Managing Partner and Secretary of the Advanced Corporate Networking, Inc. (the "Company"). My business address is 192 Naugatuck Ave, Milford, Connecticut 06460.

I have personal knowledge of the facts stated in this Accompanying Statement to Annual Certification of CPNI Compliance. I am responsible for overseeing compliance with the Federal Communication Commission's (FCC) rules relating to customer proprietary network information ("CPNI").

The Company has not used CPNI except as included in 47 U.S.C. 222(d) exceptions.

1. The Company has established a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.
2. The Company's procedures require personnel to be trained as to when they are and are not authorized to use CPNI, but no decisions regarding CPNI are made without first consulting me. The Company has an express disciplinary process in place for any improper use of CPNI. Any improper use of CPNI shall be treated as a serious offense and may result in suspension or termination of employment in appropriate cases. Any company personnel making improper use of CPNI will undergo additional training to ensure future compliance.
3. The Company has not used CPNI in any sales or marketing campaign. However, the Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI and its affiliates' sales and marketing campaigns that use its customers' CPNI. It is also the Company's policy to maintain a record of all instances where CPNI is disclosed or provided to third parties, or when third parties are allowed access to CPNI. The records are to include a description of each campaign, the specific CPNI that is used in the campaign, and what products and services are offered as a part of the campaign. Such records shall be retained by the Company for one year.
4. No outbound sales and marketing campaign can be conducted without management approval and such campaign would require supervisory review by me to assure compliance with CPNI rules. In deciding whether the use of CPNI is proper, I would consult one or more of the following: the Company's compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and if necessary, legal counsel.
5. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company's policy is to maintain records of customer approval and disapproval for use of CPNI in a readily available location that can be consulted on an as-needed basis.



Ronald Richtarich  
Managing Partner and Secretary of  
Advanced Corporate Networking, Inc.